

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS ANTITRUST LITIGATION	)	MDL No. 2817
	)	Case No. 1:18-CV-00864
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<i>This document relates to:</i>	)	
	)	Hon. Robert M. Dow, Jr.
ALL CASES	)	Magistrate Judge Jeffrey T. Gilbert

**THE REYNOLDS AND REYNOLDS COMPANY'S MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS PURSUANT TO SUBPOENA**

Defendant The Reynolds and Reynolds Company (“Reynolds”) respectfully moves this Court for an Order compelling nonparty Dominion Enterprises, Inc. (“Dominion”) to produce documents pursuant to Rule 45(d)(2)(B)(i) of the Federal Rules of Civil Procedure. In support of this motion, Reynolds submits the accompanying memorandum of law.

Pursuant to Local Rule 37.2, Reynolds certifies that it has met and conferred with Dominion’s counsel in a good faith attempt to resolve the dispute presented by this motion. The first telephonic conference with Dominion’s counsel took place on May 18, 2018. The participants were Leo D. Caseria for Reynolds and Marc Schildkraut for Dominion. The second telephonic conference took place on June 26, 2018 between Michael P.A. Cohen for Reynolds and Marc Schildkraut for Dominion. The third telephonic conference took place on July 19, 2018 between James L. McGinnis for Reynolds and Marc Schildkraut for Dominion. The final telephonic conference occurred on July 20 between Michael P.A. Cohen for Reynolds and Marc Schildkraut for Dominion. Counsel also conferred via email between May 22 and July 20, 2018, and confirmed that the parties had reached an impasse. The email correspondence participants were Leo D. Caseria, Michael P.A. Cohen, and James L. McGinnis for Reynolds, and Marc Schildkraut for Dominion.

Dated: July 23, 2018

Respectfully submitted,

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*Counsel for Defendant The Reynolds and  
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**CERTIFICATE OF SERVICE**

I, Leo D. Caseria, an attorney, hereby certify that on July 23, 2018, I caused a true and correct copy of the foregoing **THE REYNOLDS AND REYNOLDS COMPANY'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS PURSUANT TO SUBPOENA**, to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System. A copy of the foregoing will be served on non-party Dominion via hand delivery and a courtesy copy sent to Dominion's counsel via electronic mail.

*/s/ Leo D. Caseria*  
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